

# **EXHIBIT A**

Hon. Charles A. Legge (Ret.)  
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Special Master

JAMS

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

CRAGO, INC., et al.,

Plaintiffs,

vs.

CHUNGHWA PICTURE TUBES, LTD., et al.,

Defendants.

**No. 07-5944 SC**  
**MDL No. 1917**  
**JAMS Reference No. 1100054618**

**PROCEDURAL AND SCHEDULING  
ORDER**

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This Document Relates to  
ALL CASES

On November 12, 2010 several discovery motions were heard by the Special Master. This Procedural and Scheduling Order pertains to three of those motions, and to the scheduling of certain dates. A separate order will be issued with respect to the other two motions that were heard on November 12, 2010.

1. Motion by plaintiffs for discovery against the Hitachi defendants regarding "CRT Products":

By November 30, 2010 the Hitachi defendants are to submit to plaintiffs an offer of proof as to which Hitachi companies have been engaged in the CRT and/or CRT Products businesses

1 from January 1995 to date. The offer of proof is to include dates during which the Hitachi  
2 defendants were engaged in such businesses, and should affirmatively state the periods of time  
3 when they were not engaged in such businesses. The purpose of the offer of proof is to aid in  
4 identifying what custodians might or might not have information on the subject matter of  
5 Hitachi's activities regarding CRT Products. The Special Master anticipates that any stipulation  
6 between the parties, or recommended order by the Special Master, will identify the discovery  
7 search to be done based upon named custodians.

8 The parties are to meet and confer by December 7, 2010 to attempt to agree on which  
9 custodians of the Hitachi defendants will be asked to provide information on the subject of CRT  
10 Products.

11 The parties are to report to the Special Master by December 14, 2010.

12 The Hitachi defendants are also supply to plaintiffs a declaration by an appropriate  
13 representative of Hitachi American Limited ("HAL") stating that there has been a search of the  
14 records of the company, defining the scope of the search, and stating that the search has  
15 disclosed no documents responsive to the discovery requests. This need not be done by a  
16 specific date, but within a reasonable time.

17 2. Plaintiffs' motion to compel the Hitachi defendants to respond to discovery  
18 concerning foreign activities and data. And 3. plaintiffs' motion to compel the Hitachi  
19 defendants to produce discovery for a time period prior to November of 2003:

20 By December 8, 2010 the Hitachi defendants are to produce to plaintiffs organizational  
21 charts of the companies which were engaged in the businesses of CRTs and/or CRT Products,  
22 including identification of the persons employed by those companies who had authority over  
23 pricing, sales, or marketing. The information is to encompass the time period from January 1995  
24 to date.

25 By December 15, 2010 plaintiffs and the Hitachi defendants are to mutually exchange  
26 lists of potential custodians of information within the Hitachi companies to whom appropriate  
27 discovery on the subject matters of these two discovery motions might be directed.

28 By December 29, 2010 the parties are to meet and confer to attempt to agree on a list of  
custodians. The objective is that the stipulation or order for discovery will be based upon named  
custodians.

1 By January 5, 2011 the parties are to report to the Special Master.

2  
3 4. The Special Master recognizes that there may be some duplication or overlap of  
4 the written information to be provided by the Hitachi defendants to plaintiffs under paragraphs 1,  
5 2 and 3 above. Solely for the purpose of avoiding duplication, the parties may, by stipulation  
6 agree to a different or combined format, or to different dates, for the written information;  
7 provided, however, that the dates for reporting to the Special Master are not to be deferred  
8 beyond January 5, 2011.

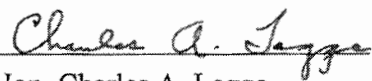
9 5. Further proceedings in the above three motions are continued to a date to be set  
10 by the Special Master after receipt of the reports of counsel.

11 6. The Case Management Conference previously scheduled for November 29, 2010,  
12 is vacated and will be rescheduled by the Special Master.

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14 IT IS SO ORDERED.

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16  
17 November 17, 2010

18 Date

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20 Hon. Charles A. Legge  
21 Special Master  
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